

Date: July 31, 2008

Cathy Hsu
Economist
Federal Communications Commission
International Bureau
Policy Division
455 12th Street, SW Room 7-B522
Washington, D.C. 20554

Dear : Ms. Hue

As to follow up on our phone conversation about additional ISPC's, the first two ISPC are used by our STP pair situated in Dallas and Nashville. ISPC are needed for these as they are connected to multiple SS7 / C7 networks worldwide and therefore must be globally unique.

The third ISPC is used by our applications, this applications sits behind our STPs. Because the application needs to handles point code / SSN routed traffic, in addition to the normal global title routed traffic, it must have a globally unique ISPC for traffic routed to it.

To conserve the use of ISPC, the physical point code(s) for the individual application(s) running at each site are actually local ITU formatted SPC, not global ISPC. The STP then performs PC translation to route to the individual applications. However, this still leave the requirement for one ISPC to achieve global visibility / routability for all applications

Sincerely,

Eddie DeCurtis
International Technical Director